

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON (AT TACOMA)

JEREMY WOLFSON,

Plaintiff,

vs.

BANK OF AMERICA, NATIONAL  
ASSOCIATION, its successors in interest  
and/or Assigns; MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS INC,

Defendants.

No. C17-6064 BHS

PLAINTIFF'S VERIFIED MOTION TO  
CONTINUE DEADLINES AND ORDER  
THEREON

NOTE ON MOTION CALENDAR:  
APRIL 10, 2019

**CERTIFICATION**

The undersigned certifies that I conferred with counsel for Defendants, and they will oppose.

**MOTION**

Plaintiff moves the Court to extend all pending deadlines set forth in the Order Setting Bench Trial and Pretrial Dates (Docket No. 72) by approximately 90 days, and to set the deadlines below for Mr. Wolfson to produce documents and appear at his deposition. There is



1 good cause for this motion. Plaintiff Jeremy Wolfson travels outside the state of Washington  
2 frequently for business. Most or all court business is suspended during the coronavirus crisis.  
3 **All public libraries and law libraries are closed, making legal research difficult or**  
4 **impossible.** Please note that public libraries and law libraries are part of the legal system, as  
5 laws are published there, and therefore there can be no due process unless the libraries are open.  
6 Currently, the deadline to complete discovery is April 27, 2020. A continuance of the current  
7 deadlines in this case is necessary to complete discovery.

8 This motion is based upon the following facts:

- 9 1. The deposition of Mr. Wolfson has been completed.
- 10 2. On 4/8/2019, Mr. Wolfson served requests for admissions, production of documents  
11 and interrogatories on Defendants Bank of America and MERS.
- 12 3. The responses from Defendants Bank of America and MERS were unsatisfactory as  
13 they mostly consisted of objections, and plaintiff must move to compel proper  
14 responses if negotiations fail.
- 15 4. Mr. Wolfson has served a Rule 31 Deposition by Written Questions on each of  
16 Defendants BANA and MERS.
- 17 5. A continuance of current deadlines is necessary to allow discovery to be concluded  
18 and accommodate Mr. Wolfson's work schedule and the reopening of the libraries to  
19 allow for legal research.

20 Plaintiff requests that the Court approve this motion and enter an amended Order Setting  
21 Bench Trial and Pretrial Dates continuing the pending deadlines and trial setting by  
22 approximately 90 days, or to such other dates as determined by the Court. For  
23 convenience, the following deadlines reflect a continuance of approximately 90 days:

24 THREE DAY BENCH TRIAL set for 9:00am- November 17, 2020

25 Disclosure of rebuttal expert testimony under FRCP 26(a)(2)- June 11, 2020

26 All motions related to discovery must be filed by- June 23, 2020  
27

1 Discovery completed by- July 21, 2020

2 All dispositive motions must be filed by- August 20, 2020

3 Motions in limine should be filed with the Court by- October 27, 2020

4 Pretrial conference will be held at 11:00 am on- November 3, 2020

5 Trial briefs, proposed findings and conclusions and deposition designations  
6 due by- October 28, 2020

7  
8 I declare under penalty of perjury that the foregoing is true and correct.

9 Executed on this 31 day of March, 2020.

10  
11 /s/ Jeremy Wolfson

12 Jeremy Wolfson, Plaintiff  
13 16208 132nd Ave East  
14 Puyallup, WA 98374  
15 (253) 592-7860

16  
17 THE FOREGOING MOTION IS APPROVED BY THE COURT. IT IS SO  
18 ORDERED.

19 Dated this \_\_\_\_ day of \_\_\_\_\_, 2020.

20  
21  
22  
23 \_\_\_\_\_  
24 UNITED STATES DISTRICT JUDGE  
25  
26  
27



**CERTIFICATE OF SERVICE**

I hereby certify that on the 31<sup>st</sup> March, 2019,

1. I caused to be electronically filed the foregoing PLAINTIFF'S VERIFIED MOTION TO CONTINUE DEADLINES AND SET DEPOSITION AND ORDER THEREON with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

**Daniel J. Gibbons:** [djg@witherspoonkelley.com](mailto:djg@witherspoonkelley.com)

DOUGLAS C. STASTNY, WSBA No. 52383

[dcg@severson.com](mailto:dcg@severson.com)

SEVERSON & WERSON

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The Atrium

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Irvine, California 92612

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2. I hereby certify that I have mailed by United States Postal Service the foregoing document to the following non-CM/ECF participants at the address listed: **None.**

3. I hereby certify that I have mailed by United States Postal Service the document to the following CM/ECF participants at the address listed below: **None.**

4. I hereby certify that I have hand-delivered the document to the following participants at the addresses listed below: **None.**

s/ Jeremy Wolfson

Jeremy Wolfson  
16208 132nd Ave East  
Puyallup, WA 98374  
(253) 592-7860

